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Attorneys for Defendants
American Federation of Teachers and
National Education Association

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

RICHARD JACKSON, et al.,

Plaintiffs,

v.

TWITTER, INC., et al.,

Defendants.

CASE NO. 2:22-cv-09438 AB (MAA)

**DEFENDANTS AMERICAN
FEDERATION OF TEACHERS
AND NATIONAL EDUCATION
ASSOCIATION'S NOTICE OF
MOTION AND MOTION TO
DISMISS**

Date: June 9, 2023
Time: 10:00 a.m.
Courtroom: 7B
Judge: Hon. André Birotte Jr.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on June 9, 2023 at 10:00 a.m., or as soon thereafter as the matter may be heard in the above-entitled Court, before the Honorable André Birotte Jr. of the United States District Court for the Central District of California, in Courtroom 7B of the United States Courthouse, located at 350 West First Street, Los Angeles, CA 90012, Defendants American Federation of Teachers (“AFT”) and National Education Association (“NEA”) (collectively, “the Unions”) will and hereby do move to dismiss plaintiffs’ claims against the

1 Unions under Rule 12 of the Federal Rules of Civil Procedure without leave to
2 amend on the grounds that Plaintiffs do not have Article III standing, their
3 Complaint fails to state a claim, and the Defendant Unions are immunized from
4 liability under the First Amendment to the United State Constitution.

5 This motion is based on this Notice of Motion, the accompanying
6 Memorandum of Points and Authorities, all other pleadings and papers on file in
7 this action, and such other matters as may be presented to the Court at the time of
8 the hearing.

9 This motion is made following a conference of counsel pursuant to Local
10 Rule 7-3, which occurred by telephone on April 11, 2023.

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12 DATED: April 21, 2023

GLENN ROTHNER
ELI NADURIS-WEISSMAN
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15 By /s/ Glenn Rothner
GLENN ROTHNER
16 Attorneys for Defendants
American Federation of Teachers and
17 National Education Association
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